

UNFILED  
DATE: 2-15-05  
BY: CMB

IN THE UNITED STATES DISTRICT COURT  
DISTRICT MASSACHUSETTS

FILED  
IN CLERKS OFFICE

2005 FEB 14 P 12:05

U.S. DISTRICT COURT  
DISTRICT OF MASS.

GLOBAL NAPS, INC.,

Plaintiff,

v.

Civil Action No. 02-12489-RWZ

VERIZON NEW ENGLAND INC.,  
D/B/A VERIZON MASSACHUSETTS,  
ET AL.

GLOBAL NAPS, INC.,

Plaintiff,

v.

Civil Action No. 03-10437-DPW

VERIZON NEW ENGLAND INC.,  
D/B/A VERIZON MASSACHUSETTS,  
ET AL.

**MOTION FOR CONSOLIDATION OF CASES**

Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon"), pursuant to Fed. R. Civ. P 42(a) and 40.1(J), submits this motion to consolidate a recently filed case, *Global NAPS, Inc. v. Verizon New England Inc., d/b/a Verizon Massachusetts*, Civil Action No. 05-10079-MLW (a copy of which is attached to the accompanying Memorandum of Reasons In Support of Motion for Consolidation of Cases as Exhibit 1), with a related civil action pending before this Court — Civil Action No. 02-12489-RWZ.

Allowed by agreement  
Ryan Zohary  
4/11/05

(20)

In support of its motion, Verizon relies on the arguments and supporting authorities set forth in the accompanying Memorandum of Reasons In Support of Consolidation of Cases.

For the reasons set forth in the accompanying memorandum, the Court should grant Verizon's motion for consolidation of cases, and consolidate GNAPs' Complaint (*Global NAPs, Inc. v. Verizon New England Inc., d/b/a Verizon Massachusetts*, Civil Action No. 05-10079-MLW) with Civil Action No. 02-12489-RWZ before the Honorable Rya W. Zobel in this docket.

Respectfully submitted,

VERIZON NEW ENGLAND INC., d/b/a  
VERIZON MASSACHUSETTS,

By its attorneys,

A handwritten signature in cursive script, reading "Keefe B. Clemons", is written over a horizontal line.

Bruce P. Beausejour [MA Bar No. 034840]

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February 14, 2005

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I, Keefe B. Clemons, hereby certify that counsel for Verizon MA has conferred with counsel for GNAPs and the Department of Telecommunications and Energy as required by local rule 7.1(A)(2).

Keefe B. Clemons

February 14, 2005

**CERTIFICATE OF SERVICE**

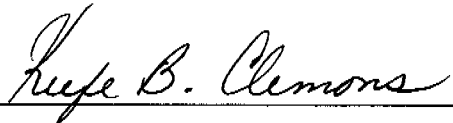
I hereby certify that, on this 14th day of February 2005, I caused a copy of the foregoing Motion for Consolidation of Cases and accompanying Memorandum of Reasons In Support of Motion for Consolidation of Cases to be served by hand or first-class mail, postage prepaid, on the following counsel:

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